

**IN THE UNITED STATES DISTRICT COURT  
FOR THE STATE OF DELAWARE**

KERRY JOHNSON and  
SHARON ANDERSON,  
on behalf of themselves and all  
others similarly situated,

Plaintiffs,

C.A. No. 1:06-cv408 (JJF)

V.

GOVERNMENT EMPLOYEES  
INSURANCE COMPANY,  
GEICO CASUALTY COMPANY,  
GEICO GENERAL INSURANCE  
COMPANY, and GEICO INDEMNITY  
COMPANY,

## NON-ARBITRATION

## TRIAL-BY JURY DEMANDED

## CLASS ACTION

Defendants.

**RE-NOTICE OF 30(B)(6) DEPOSITION<sup>1</sup>**

TO: Dawn L. Becker, Esquire  
Gary Alderson, Esquire  
LAW OFFICES OF DAWN L. BECKER  
Citizens Bank Center  
919 Market Street, Suite 725  
Wilmington, DE 19801

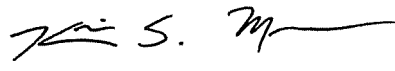
George M. Church, Esquire  
Laura A. Cellucci, Esquire  
MILES & STOCKBRIDGE P.C.  
10 Light Street  
Baltimore, MD 21202

**PLEASE TAKE NOTICE** that pursuant to District Court Rule 30(b)(6), the Plaintiffs will take the deposition upon oral examination of the person designated by Defendants with respect to the topics set forth in Exhibit A. The deposition will take place on May 13, 2008, commencing at 11:00 a.m. at the offices of Miles & Stockbridge P.C., 10 Light Street, Baltimore, Maryland, or such other date or at such other time or place as may be agreed upon by the parties or ordered by the Court. The deposition will be recorded by stenographic means.

<sup>1</sup> This is a continuation of the 30(b)(6) deposition previously begun on April 9, 2008.

Dated: April 25, 2008  
Wilmington, Delaware

CROSS & SIMON, LLC

By:   
Richard H. Cross, Jr. (No. 3576)  
Christopher P. Simon (No. 3697)  
Kevin S. Mann (No. 4576)  
913 North Market Street, 11<sup>th</sup> Floor  
P.O. Box 1380  
Wilmington, Delaware 19899-1380  
(302) 777-4200  
(302) 777-4224 (fax)

*Attorneys for Plaintiffs*

**EXHIBIT A**

- How Defendants' Delaware PIP claims, as defined by 21 Del. C. § 2118B, ("PIP Claims") are processed.
- How Defendants' Delaware PIP coverage in Defendants' Delaware insurance policies are written.
- Who writes Defendants' Delaware PIP coverage in Defendants' Delaware insurance policies.
- How Defendants' Delaware PIP Claims are reviewed.
- How Defendants determine to reduce payments for Delaware PIP Claims submitted by their Delaware insureds.
- How Defendants determine what amounts are reasonable and necessary charges for PIP Claims submitted by their Delaware insureds.
- Knowledge of Defendants' Delaware PIP Claims (i.e. amounts submitted by Defendants' insureds in Delaware, the amount paid on Defendants' insureds claims, basis for reductions).
- How Defendants' claims adjustors are assigned to handle or process PIP Claims.
- How Defendants' claims adjustors are trained to handle or process PIP Claims.
- The number of Defendants' Delaware insureds for the period of June 26, 2001 to the present.
- The number of Defendants' Delaware insureds who filed PIP Claims for the period of June 26, 2001 to the present.
- The dollar amount of Defendants' insureds' PIP Claims submitted by Delaware insureds for the period of June 26, 2001 to the present. The witness should be prepared to provide information for each calendar year.
- The dollar amount of Defendants' insureds' PIP Claims paid in Delaware for the period of June 26, 2001 to the present. The witness should be prepared to provide information for each calendar year.
- How Defendants' Delaware PIP Claims are tracked.
- How determinations are made to cut off medical payments or reimbursements for Delaware PIP Claims submitted by Defendants' Delaware insureds.

- The time between when Delaware PIP claims were received by Defendants and when they were paid for the period of June 26, 2001 to the present.
- Defendants' "rules" applied to, or created for PIP Claims.
- Defendants' "management reports" prepared for Defendants' management to monitor or assess PIP Claims and cost containment measures relating to PIP Claims.
- The identity of any adjuster(s) responsible for Kerry Johnson's PIP file and, to the extent there is more than one, the periods of time and to which aspects each adjuster was responsible.
- The identity of any adjuster(s) responsible for Sharon Anderson's PIP file and, to the extent there is more than one, the periods of time and to which aspects each adjuster was responsible.
- The identity of any individual(s) who authorized payment and/or reimbursement of PIP claims for Kerry Johnson.
- The identity of any individual(s) who authorized payment and/or reimbursement of PIP claims for Sharon Anderson.

**CERTIFICATE OF SERVICE**

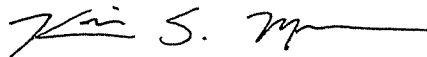
I hereby certify that on this 25th day of April, 2008, a true and correct copy of the foregoing *Re-Notice of 30(b)(6) Deposition* was served on the following counsel of record in the manner indicated:

**BY HAND DELIVERY**

Dawn L. Becker, Esquire  
Gary Alderson, Esquire  
LAW OFFICES OF DAWN L. BECKER  
Citizens Bank Center  
919 Market Street, Suite 725  
Wilmington, DE 19801

**BY FIRST CLASS MAIL**

George M. Church, Esquire  
Laura A. Cellucci, Esquire  
MILES & STOCKBRIDGE P.C.  
10 Light Street  
Baltimore, Maryland 21202



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Kevin S. Mann (No. 4576)